

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

CASE NO.: 1:16-CR-00224-PAG

Plaintiff,

JUDGE PATRICIA A. GAUGHAN

~ VS ~

BOGDAN NICOLESCU,

Defendant.

MOTION FOR EXTENSION OF TIME TO  
FILE RESPONSE TO AMENDED MOTION IN  
LIMINE (DOC. 104) AND SECOND MOTION  
IN LIMINE REGARDING AUTHENTICATION  
(DOC. 108)

NOW COMES the Defendant, Bogdan Niculescu, by and through his undersigned counsel, and respectfully requests that this Honorable Court issue an Order extending the time within which Defendant is permitted to respond to the *Government's Amended Motion In Limine* (Doc. 104) and *Second Motion in Limine Regarding Authentication* (Doc. 108) for a period of two (2) weeks—until February 28, 2018—for the following reasons:

Undersigned counsel understands this Honorable Court has already granted additional time to respond to the *Government's Amended Motion In Limine* (Doc. 104). However, due to the voluminous nature of the exhibits sought to be introduced by the Government, more than 2400 exhibits, and the significant volume of some of the exhibits, undersigned counsel requires additional time to fully and appropriately review and respond to the Government's argument for each exhibit. Counsel has devoted a significant amount of time to this response thus far and an addition two (2) weeks is required to properly and accurately review all of the exhibits the Government seeks to introduce, as well as respond to the *Motion in Limine* appropriately. Further,

undersigned counsel needs additional time to properly respond to the Government's *Second Motion in Limine Regarding Authentication* (Doc. 108), which is presently due on Thursday, February 7, 2019.

This Motion for a second extension of time is not intended for purposes of delay and undersigned counsel does not believe the Government will suffer prejudice if the herein requested extension is granted.

For the foregoing reasons, it is respectfully requested that this Honorable Court issue an Order extending the time within which Defendant has to respond to the *Government's Amended Motion In Limine* (Doc. 104) and *Second Motion in Limine Regarding Authentication* (Doc. 108) for two (2) weeks, until February 28, 2018.

Respectfully submitted,

*/s/- Michael J. Goldberg*  

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>TH</sup> day of February, 2019, a copy of the foregoing has been filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*/s/ - Michael J. Goldberg*  
**MICHAEL J. GOLDBERG (0040839)**  
Attorney for Defendant